

Taimur Alamgir, Esq.  
[talamgir@kdvlaw.com](mailto:talamgir@kdvlaw.com)

November 10, 2023

**Via ECF**

Honorable Sarah Netburn  
United States District Court  
40 Foley Square  
New York, NY 10007

**Re: Cox, et al. v. Procida Construction Corp., et al. S.D.N.Y. No. 22-cv-10549 (LGS)**

Your Honor:

Our firm represents Defendants in the above-captioned matter. I write, on behalf of both parties, to notify the Court of agreed-upon deposition dates and to propose a fact discovery deadline.

<b><u>EVENT</u></b>	<b><u>DATE/DEADLINE</u></b>
<b>Deposition of Kassim Adams</b>	December 5, 2023
<b>Deposition of Barrington Henry</b>	December 11, 2023
<b>Deposition of Randy Clayton</b>	December 12, 2023
<b>Deposition of Kyle Cox</b>	December 14, 2023
<b>Deposition of Carlik Jones</b>	December 21, 2023
<b>Deposition of Mario Procida (also Rule 30(b)(6) Witness)</b>	January 4, 2024
<b>Proposed Fact Discovery Deadline</b>	February 15, 2024

We thank the Court for considering this joint submission.

Respectfully Submitted,  
**KAUFMAN DOLOWICH, LLP**



By: \_\_\_\_\_  
Taimur Alamgir

cc: Plaintiff's counsel (via ECF)